

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CITY OF PONTIAC GENERAL EMPLOYEES'
RETIREMENT SYSTEM, Individually and on Behalf of All
Others Similarly Situated,

No. 11 Civ. 5026 (JSR)(RLE)

ECF CASE

Plaintiff,

vs.

LOCKHEED MARTIN CORPORATION, ROBERT
STEVENS, BRUCE TANNER and LINDA GOODEN,

Defendants.
-----x

**NOTICE OF MOTION BY LOCKHEED MARTIN CORPORATION
FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE, that the undersigned attorneys for Defendants will move this Court at the Courthouse for the United States District Court for the Southern District of New York, 500 Pearl Street, Courtroom 14B, New York, New York 10007, on December 3, 2012, at 5:00 P.M., for an Order of the Court, pursuant to Rule 56 of the Federal Rules of Civil Procedure granting summary judgment for Defendants and for such other and further relief as the Court may deem just and proper.

Defendants shall file and serve their moving papers on or before November 5, 2012. To the extent that Plaintiff seeks to oppose Defendants' motion, it shall file and serve its answering papers on or before November 19, 2012. Defendants shall file and serve their reply papers on or before November 27, 2012.

Defendants submit the instant Notice pursuant to the Court's order during the telephone conference held with the parties on October 2, 2012, directing that the parties file Notices of Motion for Summary Judgment, if any, by this date.

Dated: October 25, 2012
New York, New York

By: /s/ John M. Hillebrecht
James D. Wareham (admitted *pro hac vice*)
(james.wareham@dlapiper.com)

John M. Hillebrecht
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*Attorneys for Lockheed Martin Corporation,
Robert Stevens, Bruce Tanner, and
Linda Gooden*

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PROOF OF SERVICE

STATE OF NEW YORK)
: ss.:
COUNTY OF NEW YORK)

ERIC M. MERKLINGER, being duly sworn, deposes and says that I am over 18 years of age and not a party to this action. That, on the 25th day of October 2012, I served a true copy of the Defendants' Notice of Motion for Summary Judgment upon plaintiffs listed below in this action by ECF notification:

Samuel H. Rudman
Robbins Geller Rudman & Dowd LLP
655 West Broadway, Suite 1900
San Diego, CA 92101
srudman@rgrdlaw.com


Eric Merklinger

Sworn to before me this
25th day of October 2012


Notary Public

FRANK GONZALEZ
Notary Public, State of New York
No. 01GO6056171
Qualified in New York County
Commission Expires March 19, 20 15